

EXHIBIT 42

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

- - - - - x Case No.
: 5:14-cv-05344-BLF (PSG)
:
CISCO SYSTEMS, INC., :
:
Plaintiff, :
:
vs. :
:
ARISTA NETWORKS, INC., :
:
Defendant. :
:
- - - - - x

VIDEOTAPED DEPOSITION OF GREG SATZ
March 23, 2016
HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VOLUME 1

Reported by
Brooke R. Bohr
CSR No. 753
Job No 2272380
Pages 1 - 168

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 97

1 point it out, there's two that I used. That's
2 funny.

3 Q. Well, I believe later there -- it -- I
4 think it was later, there was something called
5 radius dash server?

6 A. It was a follow-on to the TACACS
7 protocol.

8 Q. Okay.

9 A. That was the next generation of the
10 solution to authenticate.

11 Q. And where did radius come from? Do you
12 know?

13 A. Part of the protocol standard of
14 whoever they called it. Again, it is name-
15 calling. Somebody comes up with a name. It is
16 like any Microsoft or somebody code names Apple,
17 right, with their iPhone or their car products.
18 It is secret names.

19 Q. Well, do you know where the radius
20 protocol --

21 A. I don't recall anymore.

22 Q. -- where it came from?

23 A. I think I implemented that one, too.
24 Yeah, I think the reason I used server is I
25 equated them to Unix services as an optional

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 98

1 service. And so I called them a server, like you
2 would on an operating system running as a separate
3 process. So it was just a distinction I happened
4 to use just from where I had come from.

5 Q. In the Unix context, what -- how was
6 that manifest itself, or what's an example of that
7 in the Unix context?

8 A. Well, Unix is what is on these phones.
9 It is Linux. It is just the next generation of
10 it. And so it is any arbitrary process running in
11 the background that people might call a demon that
12 provides a service. I mean you -- your -- you go
13 to the web, you're talking to a web server. It
14 just happens to be a dash in the configuration
15 language.

16 Q. Right.

17 A. Maybe that helps with the modern
18 analysis in comparison, as opposed to a routing
19 protocol or a switching engine or a link layer,
20 like an ARP. I mean, there's all these different
21 components.

22 Q. Okay. I think we can put that aside.

23 So are you familiar with the terminal
24 monitor command?

25 A. Yes.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 99

1 Q. And do you know the origins of that?

2 A. I think I wrote it.

3 Q. Okay. What function does the terminal
4 monitor command invoke?

5 A. I now use it without thinking. So the
6 ability to figure out what's happening in a piece
7 of software requires some diagnostics. And so we
8 created a lot of debug commands that would print
9 out the debugging. The debugging typically only
10 went to the console which, in the good old big
11 iron hardware, wasn't a bitmap display, but just
12 an RS-232 port, and usually it was hooked to a
13 good old-fashioned terminal in today's
14 perspective. So the stream of debug diagnostic
15 messages would come out this console port and if
16 you're sitting at home, trying to connect in and
17 do some debugging, it couldn't get there from
18 here. The data was going over to your office in
19 some terminal and the only way to look at it was
20 to attach a stream back to where you were, and
21 that was what monitor did. It said send me
22 anything that came out on the console to my
23 virtual terminal connection.

24 Now all laptops have bitmap displays
25 and fancy graphics and no one even says RS-232

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 100

1 anymore.

2 Q. So am I right, then, that "monitor" in
3 the command terminal monitor refers to monitoring
4 the bug diagnostics?

5 A. It is actually monitoring anything that
6 gets printed to the console port.

7 Q. Okay.

8 A. Which the important stuff was the
9 diagnostics. It is the old world screen sharing
10 of today.

11 Q. And did you write the code to implement
12 that feature?

13 A. Yes.

14 Q. When did you do that, approximately?

15 A. Wherever it shows up in the manuals.

16 Q. Early, early years?

17 A. Yeah, because we needed that to help
18 improve our proficiency to debug so we didn't have
19 to be at the office.

20 Q. And how did you come upon the selection
21 of the command terminal monitor for that?

22 A. The same expediency I did all of them:
23 Monitor, sounds good, next.

24 Q. Okay.

25 A. Yeah. Unless Kirk didn't like my

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 101

1 choice, I think it was just whatever that struck
2 me as a -- as what it did as I could perceive it
3 from the point of view at the time.

4 Q. Have you ever heard of the term --
5 well, strike that.

6 Have you ever heard of people in your
7 field characterizing a command as a "generic
8 command"?

9 A. Yes.

10 Q. What does that mean to you?

11 A. Like "show." It is everywhere.

12 Q. And how would you contrast that concept
13 of a generic command like show versus a non-
14 generic command?

15 A. Its applicability to many different
16 aspects or areas. So to -- I mean to use the word
17 "generic" is not really clear, but it's --
18 probably if you look at it in the hierarchy sense,
19 the top node is pretty generic. And depending on
20 how many commands under it -- so relationship to
21 the other commands around it or below it, if it is
22 the root of a very deep tree, it's going to be
23 more generic than if it's just one layer deep.
24 And its applicability therefore expands out.

25 Q. So if I understand you, then, at a high

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 102

1 level something like the show family of commands
2 is generic?

3 A. Set. I mean they are words that imply
4 an action that can be used in a great many areas
5 in the software.

6 Q. But you -- am I -- if I understand you,
7 you would say something like show IPOSF database,
8 database dash summary might not be as generic?

9 A. The further down the tree you go,
10 you're getting more specific.

11 Q. Okay. All right. Let's talk a little
12 bit about Terry Slattery's work. And can you tell
13 me, in general terms, what it was that Terry did
14 that you hired Terry to do?

15 A. Terry's job was to take the Cisco
16 source code and address how commands were parsed
17 from the EXEC perspective that you used in the
18 TOPS-20, which is the user interface commands
19 which users type directly in the configuration
20 commands, so that we would maximize code
21 reusability and programmer efficiency.

22 So he and his team would generate a
23 result that would improve our programming
24 efficiency and maintenance overhead, to lower our
25 maintenance overhead, which he did do.